
FARRELL & SMITH LLP

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RESPOND TO CHATHAM OFFICE

February 15, 2018

Via UPS

David F. Anderson

Latti & Anderson LLP

30 Union Wharf

Boston, MA 02109

Re: NLFIC and BoatU.S. v. Carman
D. R.I. Case 1:17-cv-00038-S-PAS

Dear Attorney Anderson:

Enclosed is both plaintiffs' document production.

There are hard paper copies of the *Claims Procedure Manual* and *BoatU.S. Claims Training Guide 2015*. Both are CONFIDENTIAL.

There is one "PNY" thumb drive with two main files, each containing sub-files:

1602366 CARMAN (the engine overheat claim)

Binder Claim 1602366-CARMAN 0206.pdf

(By my count, 11 pages have been deleted which are attorney-client privileged emails from Farrell McAleer & Smith to BoatU.S. related to Mr. Carman's sinking claim on which I erroneously referenced the engine overheat claim number)

1607671 CARMAN (the sinking claim)

OLD BINDER & MEMO

(The above MEMO is deleted from the thumb drive but was produced as Plaintiffs' Initial Disclosure documents P00158-00175 with attorney-client privileged communications between BoatU.S. and Farrell McAleer & Smith redacted)

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BINDER 1 - 1607671 - CARMAN - 0206
(By my count, 15 pages have been deleted which are attorney-client privileged communications between BoatU.S. and Farrell McAleer & Smith/Farrell & Smith)

UW File

3985989-MEMOS

3985989-OLD MEMOS

3985989-UW FILE

PDFs numbered from 04 to 201
(Other numbered PDFs have been deleted which are attorney-client privileged communications between BoatU.S. and Farrell McAleer & Smith/Farrell & Smith)

There is a second "STAPLES Relay" thumb drive with several files:

ACCOUNT BALANCE

MEMOS

UW FILE DOCS

POLICY PACKAGE

OLD ACCOUNT BALANCE

FW NLF policy inquiry – 3985989-15

FW NLF policy inquiry – 3985989-15 Outsource

Webscreens activity

BoatUS VT license.tif

National Liability and Fire COA

20180112144919414

NLF_ Boat America Corporation Agency Agreement CONFIDENTIAL

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I plan to email you November – December 2015 BoatU.S. website links tomorrow or Saturday.

Very truly yours,

FARRELL & SMITH LLP



David J. Farrell, Jr.

Encs

cc. Richard S. Humphrey via email